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THE NEW SWEDEN IRRIGATION DISTRICT

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IDAHO FALLS, IDAHO

OFFICE OF THE SECRETARY-TREASURER

523-0175



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Office of Pesticide Programs (OPP) Regulatory Public Docket (7502P)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington DC 20460-0001

Docket ID number EPA-HQ-OPP-2007-0588

Sirs,

The New Sweden Irrigation District supplies irrigation water to approximately 31,000 acres in southeastern Idaho, through a system of about 125 miles of open channel canals. Unwanted aquatic vegetation is a serious problem which must be controlled each year to maintain the capacity in the canals and enable the delivery of adequate water to the patrons of the District.

As a normal part of the maintenance program we use MAGNACIDE H Herbicide (Acrolein) to control the aquatic vegetation in the canals. We have tried other methods to deal with this problem but have found none that have been successful. Mechanical control causes erosion and water quality issues which are as much of a problem as the vegetation that is being controlled. Copper based herbicides do not seem to be effective on the plants growing in this area, or in the water temperatures we normally have. Other types of herbicides that were used in the past have more serious environmental concerns associated with them and treated water could not always be used on crops as is possible with MAGNACIDE H. While this product is very expensive we feel that to try to deal with this problem with any of the other alternatives would at least double the cost of the water to the patrons.

We have used this product for more than 25 years, most of which I have personally been involved with making the applications. In that time we have constantly worked to use this pesticide in the safest and most efficient manner possible. We are required by the label to be licensed applicators and to have training to use the herbicide. Our applicators attend yearly training sessions provided by the manufacturer to stay up to date on the most current methods. The use of this product in a manner which is safe to our employee's, the public and the environment is our top priority.

The water which we use this herbicide in is strictly for irrigation, We do not supply drinking water. It is applied in irrigation canals that were built by our predecessors over 100 years ago and have been maintained, and operated by the District solely as an irrigation supply system. We take water that we have rights to from the Snake River for about 5 to 6 months each year and these canals are shut off for the remaining part of the year. The canals are not fisheries or habitat for endangered species. We have never seen dead birds or animals, or seen unintended plant damage while using this product. The treated water has always been applied to crops without any signs of damage to the crop. This herbicide at the legal maximum usage rates or less seems to only affect submerged plants, which is our target in making the applications.

This product will kill fish. There is no chronic exposure for fish. We have occasionally seen dead fish following treatments in our canals. While we find this unfortunate, the reality is that any fish that enters our canal system will be trapped due to the structures in the system, and will not survive the system being de-watered in the fall of each year. Our canals are not fisheries.

We do not believe it is possible for water treated at the legal maximum rate to travel anywhere close to 61 miles. We would never expect to see any control from a treatment over 10 miles from one application site. This product is used up by the vegetation in the canals as it moves downstream, and can be monitored with a tool which is available from the manufacturer. We have used this tool to monitor the effectiveness of our treatments. There are many variables in using this product such as water velocity, temperature, and quality and the species and amount of plant growth. It seems unrealistic to generalize the amount of time a treatment will be active.

When we are making an application we do every thing possible to minimize volatilization of this product. It is very expensive and we do not want to waste money on chemical which is not being used on the target vegetation. It has vapors which make it impossible for anything, including the applicator, to stay around it if it is not being applied correctly. It is unrealistic to say that birds or wildlife could be killed by exposure to the vapors from this product.

The New Sweden Irrigation District follows all label requirements and other laws regulating the use of this herbicide. We believe applying aquatic herbicides is something that can be done safely and we make every effort to do so. We are well familiar with the business of moving water through our system. We have used MAGNACIDE H herbicide to help us do that safely and efficiently for more than 25 years without any incident of any kind. We would encourage you to allow us to continue doing so without additional prohibitive restrictions.



Kail Sheppard Manager